

Court Exhibit  
12/20/17Insert  
after  
coop  
witness~~JOINT REQUEST NO. 59:~~

Testimony of Confidential Sources

~~(If applicable)~~Hussein  
(Huseyin  
Korkmaz)

There has been evidence introduced at trial that the Government used confidential sources in this case. I instruct you that there is nothing improper in the Government's use of confidential sources and, indeed, certain criminal conduct never would be detected without the use of such confidential sources. You, therefore, should not concern yourselves with how you personally feel about the use of confidential sources, because that is really beside the point. Put another way, your concern is to decide whether the Government has proved the guilt of the defendants beyond a reasonable doubt, regardless of whether evidence was obtained by the use of confidential sources.

On the other hand, where confidential sources testify, as they did here, their testimony must be examined with greater scrutiny than the testimony of an ordinary witness. You should consider whether the confidential sources received any benefits or promises from the Government which would motivate them to testify falsely against the defendants. For example, they may believe that they will only continue to receive these benefits if they produce evidence of criminal conduct.

If you decide to accept their testimony, after considering it in the light of all the evidence in the case, then you may give it whatever weight, if any, you find it deserves.